

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEC 10 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:20CR00775 SRC/PLC
)
KAMMERON DAVIS,)
)
Defendant.)

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Donald S. Boyce, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with four counts of Interference with Interstate Commerce by Robbery, in violation of 18 U.S.C. §1951(a), and four counts of Possession of a Firearm in Furtherance of a Crime of Violence, in violation of 18 U.S.C. §924(c). Pursuant to Title 18, United States Code, Section 4142(f)(1)(A), this case involves charges of robbery, which is a crime of violence. Pursuant to Title 18, United States Code, Section 3142(e)(3)(B), the rebuttable presumption of detention applies because the Defendant has been charged with violations of 18 U.S.C. §924(c).
2. The investigation by the Federal Bureau of Investigation has shown that on Sep 13, 2020, the Penn Station sub restraint on Hampton Ave in St. Louis City was robbed. The robber ordered

a sandwich and then pointed a gun at the employee and demanded money from the safe. The employee opened the safe, the robber took the money and fled. Cameras showed that he left in a distinctive Chevy Cruse with front end damage and 4 spare tires. On Sep 16 at 2:14 a robber attempted to rob the Subway on Manchester in Maplewood. The robber ordered a sandwich and then pointed a gun at employees and ordered them to lie on the floor. One of the employees started swinging a broom at the robber, who eventually left the store and drove away in the same Chevy Cruse. On the same day, 15 minutes later, the robber went to the Subway on Chippewa and ordered a sandwich. Then he pulled out a gun, jumped over the counter, and took cash from the register. The Chevy Cruse was captured on a traffic camera between the time of the two robberies along the route between the two Subway stores. On Sep 20, the Subway on Kingshighway in the City was robbed. This time, two men entered the store and pointed a gun at the employee. They demanded that she open the safe, but she did not have the code. One robber grabbed the change till from the register, and the two left. Traffic cameras caught the Chevy Cruse about a block away, right after the robbery. FBI eventually identified the Chevy Cruse the owner. Through electronic surveillance on the Defendant's phone, they were able to determine that the Defendant was staying at Cruse owner's apartment. FBI got a search warrant for the apartment, and the Cruse owner told FBI that she let the Defendant drive the car, and he carries a gun. Agents showed her some images from the robberies, and she identified the Defendant as the robber.

4. Based on the statutory factors in 18 U.S.C. § 3142(g), detention is appropriate in this case. Pursuant to Section 3142(g)(1), the nature and circumstances of this case are that the Defendant has been charged with a crime of violence and firearms offenses. Pursuant to Section 3142(g)(2), the weight of the evidence against the Defendant, as summarized above, is strong. Pursuant to Section 3142(g)(3), it appears that the Defendant has a prior conviction for Robbery 1st Degree, and the defendant was very recently discharge from parole.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Donald S. Boyce
DONALD S. BOYCE, #6282562IL
Assistant United States Attorney